



For a thriving New England

CLF Vermont

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February 28, 2014

Via U.S. Certified Mail, Return Receipt

Gina McCarthy, Administrator
Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington D.C. 20460

Re: Conservation Law Foundation, Inc., v. Rockrimmon Auto Parts & Recycling, Inc.,
United States District Court for the District of Massachusetts, Case No.1:14-cv-10465

Dear Administrator McCarthy:

Counsel for Plaintiff, Conservation Law Foundation (“CLF”), provides the attached proposed consent decree between CLF and Rockrimmon Auto Parts & Recycling, Inc., resolving alleged violations of the Clean Water Act and the EPA-issued Industrial Multi-Sector General Permit for Stormwater Discharges (MSGP) pursuant to 33 U.S.C. § 1365(c)(3), as set out in the attached complaint. Pursuant to the consent decree, the parties intend to file a joint motion for entry of consent judgment with the United States District Court for the District of Massachusetts. This motion will be brought before the Court following the 45-day period for U.S. government review of the consent decree required by 40 C.F.R. §135.5(b).

The consent decree provides that Rockrimmon Auto Parts & Recycling, Inc., will make a supplemental environmental project payment of \$15,000 to Nuestras Raices, 329 Main Street, Holyoke, MA 01040 for environmental restoration of or other environmental benefit to the Connecticut River watershed. We are in the process of obtaining written confirmation (“SEP Recipient Letter”) from Nuestras Raices that it (1) has read the consent decree; (2) will spend any monies it receives under the consent decree for the purposes specified in the consent decree; (3) is a 501(c)(3) tax-exempt organization; and (4) will not use any money received under the consent decree for political lobbying activities. I will instruct Nuestras Raices to mail the SEP Recipient Letter directly to the DOJ Citizen Suit Coordinator. Please feel free to contact Nuestras Raices at:

Nuestras Raices
Attn: Hilda Roqué, Executive Director
329 Main Street
Holyoke, MA 01040

By submitting this consent decree as requested, counsel for Plaintiff asks the United States to promptly review the agreement and, if it does not object to dismissal of this action, to so notify the Court.

If you have any questions or concerns regarding this matter, please contact me.

Respectfully submitted,

ATTORNEY FOR PLAINTIFF
CONSERVATION LAW FOUNDATION

/s/ Zachary K. Griefen
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